

## EXHIBIT 18

GK

**From:** Kassner, Gillian (USANYE) [Gillian.Kassner@usdoj.gov](mailto:Gillian.Kassner@usdoj.gov)  
**Subject:** RE: [EXTERNAL] Response to Dec. 14 Request #1  
**Date:** January 3, 2023 at 5:21 PM  
**To:** Paul Pelletier [pepelletier3@gmail.com](mailto:pepelletier3@gmail.com), Lash, Devon (USANYE) [DEVON.LASH@usdoj.gov](mailto:DEVON.LASH@usdoj.gov), Siegel, Jonathan (USANYE) [Jonathan.Siegel@usdoj.gov](mailto:Jonathan.Siegel@usdoj.gov), Elbert, Lauren (USANYE) [Lauren.Elbert@usdoj.gov](mailto:Lauren.Elbert@usdoj.gov)  
**Cc:** November, Anna (USANYE) [Contractor] [Anna.November@usdoj.gov](mailto:Anna.November@usdoj.gov), Nanci Clarence [nclarence@clarencedyer.com](mailto:nclarence@clarencedyer.com)

Received. Thank you, Paul.

---

**From:** Paul Pelletier <[pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)>  
**Sent:** Tuesday, January 3, 2023 8:09 PM  
**To:** Kassner, Gillian (USANYE) <[GKassner@usa.doj.gov](mailto:GKassner@usa.doj.gov)>; Lash, Devon (USANYE) <[DLASH@usa.doj.gov](mailto:DLASH@usa.doj.gov)>; Siegel, Jonathan (USANYE) <[JSiegel@usa.doj.gov](mailto:JSiegel@usa.doj.gov)>; Elbert, Lauren (USANYE) <[LElbert@usa.doj.gov](mailto:LElbert@usa.doj.gov)>  
**Cc:** November, Anna (USANYE) [Contractor] <[ANovember@usa.doj.gov](mailto:ANovember@usa.doj.gov)>; Nanci Clarence <[nclarence@clarencedyer.com](mailto:nclarence@clarencedyer.com)>  
**Subject:** [EXTERNAL] Response to Dec. 14 Request #1

Gillian: please find enclosed an index for the interview files we sent to you today by FedEx. As we discussed, it is our position that these interviews are privileged work product having been executed for the purpose of litigation with the BBC. Thus, pursuant to Rule 502 of the Federal Rules of Evidence, we do not intend to waive the privilege for all purposes but, because we presented portions of these witness interviews to you, in the spirit of cooperation and completeness, we are waiving the work product privilege for these limited purposes. As I previously explained it is our present intention to assert the work product privilege with respect to the remaining interviews conducted in support of the BBC litigation. After you complete your research into the validity of our assertion of the work product privilege, I am happy to discuss with you the potential for additional limited waivers as we have done here. I have pasted below the FedEx Tracking information. Pursuant to your recent requests, we intend to make further productions this week. Please let me know if you have any questions. Thanks for your patience. Pep

This tracking update has been requested by:

Name: Paul Pelletier  
 E-mail: [pepelletier3@gmail.com](mailto:pepelletier3@gmail.com)

---

Sent to: [gillian.kassner@usdoj.gov](mailto:gillian.kassner@usdoj.gov)

Paul Pelletier sent U.S Attorney's Office of Eastern District of New York 1 FedEx Standard Overnight® package(s). This shipment is scheduled to be sent on 01/03/2023.

Reference information includes:

Ship date:	Jan 3, 2023
Estimated delivery date:	Wed, 1/4/2023 by 4:30 pm
Service type:	FedEx Standard Overnight®
Packaging type:	FedEx® Envelope

Packaging type: **REUSABLE ENVELOPE**  
Number of pieces: **1**  
Weight: **0.50 lb.**  
Special handling/Services **Deliver Weekday**  
No Signature Required  
Standard transit: **1/4/2023 by 4:30 pm**  
Status: **Picked up**  
Tracking number: **392967013390**

Shipper Information	Recipient Information
Fairfax	Brooklyn
VA	NY
US	Paul E. Pelletier
<a href="mailto:pepelletier3@gmail.com">pepelletier3@gmail.com</a>	
202.617.9151	